

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA ROSSI, DELILAH PARKER and
KELVIN HOLMES, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

V.

CLAIRE'S STORES, INC.; CLAIRE'S
BOUTIQUES, INC.; and CBI
DISTRIBUTING CORP.,

Defendants.

Case No.: 1:20-cv-5090

Hon. Andrea R. Wood, presiding

Hon. Magistrate Heather K. McShain

**UNOPPOSED MOTION TO CONTINUE PLAINTIFFS' DEADLINE TO FILE MOTION
FOR PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiffs Julia Rossi, Delilah Parker, and Kelvin Holmes (collectively, “Plaintiffs”) bring this unopposed motion to continue Plaintiffs’ deadline to file a motion for preliminary approval¹ of their proposed class settlement with Defendants Claire’s Stores, Inc., Claire’s Boutiques, Inc., and CBI Distributing Corp. (collectively, “Defendants” and, collectively with Plaintiffs, the “Parties”). Defendants do not oppose this motion. (Declaration of Bradley K. King, attached, ¶ 2.)

As indicated in the Parties' Joint Status Report and Notice of Settlement in Principle (Dkt. 42), the Parties reached a settlement in principle after a full-day mediation session with Bennett G. Picker, Esq. on March 23, 2021. Since then, the Parties have worked diligently to draft the settlement agreement and related exhibits and anticipate being able to finalize and execute the agreement in the coming weeks. In addition, Plaintiffs have been diligently preparing their motion for preliminary approval and supporting documents.

¹ As ordered in the Court's April 20, 2021 Minute Entry, Dkt. 43.

Despite these diligent efforts, a modest extension of the current deadline is needed to ensure adequate time for the Parties to finalize their settlement and prepare all requisite documents for filing. Consequently, the Parties respectfully request an additional 30 days to file the preliminary approval motion, settlement agreement, and supporting documents.

CONCLUSION

Plaintiffs respectfully move the Court, without opposition, to continue the May 17, 2021 deadline to file a motion for preliminary approval of settlement by 30 days to June 16, 2021.

Respectfully submitted,

Dated: May 7, 2021

/s/ Bradley K. King

Bradley K. King

bking@ahdootwolfson.com

AHDOOT & WOLFSON, PC

2600 West Olive Avenue, Suite 500

Burbank, California 91505

Tel: (310) 474-9111

Fax: (310) 474-8585

M. Anderson Berry

aberry@justice4you.com

CLAYEO C. ARNOLD,

A PROFESSIONAL LAW CORP.

865 Howe Avenue

Sacramento, California 95825

Tel: (916) 777-7777

Fax: (916) 924-1829

Interim Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2021, the foregoing Unopposed Motion to Continue Plaintiffs' Deadline to File Motion for Preliminary Approval of Settlement with supporting declaration was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of the filing to all attorneys of record.

/s/ Bradley K. King